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LETTER CONFIRMING THE U S NAVY DEVIATION FROM THE FINAL REMEDIAL  
INVESTIGATION FEASIBILITY STUDY WORK PLAN TO ALLOW FOR ON SITE DISPOSAL  
OF WELL CUTTINGS NAS WHITING FIELD FL  
11/14/1990  
NAVFAC SOUTHERN

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Mr. Eric Nuzie  
Florida Department of Environmental Regulation  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

Subj: FINAL RI/FS WORK PLANS (VOLUMES I-III) DATED JUNE 1990 FOR  
NAS WHITING FIELD, FL

Dear Mr. Nuzie:

This is to confirm the telephone discussion with Mr. Ted Campbell on 6 and 13 November 1990, in which the Navy outlined a deviation from the subject work plans. This change would allow for on-site disposal of well development waters and mud rotary soil cuttings during Phase I at sites which will not exceed toxicity limits according to RCRA criteria. This approach is based on site conditions and results obtained in the 1986 Verification Study. A full justification is provided below:

ON-SITE CUTTINGS DISPOSAL: The purpose of the 6 wells and 2 piezometers slated for installation during Phase I is to obtain background screening information and further-refined potentiometric mapping data. In all 8 cases the wells will be located topographically and hydraulically upgradient from the release site. There is, therefore, no reason to expect soil contamination in either the vadose zone or below the water table. Because the aquifer is expected to be clean in all of these well areas, it is proposed to dispose of the mud rotary cuttings on-site. Further, we propose to perform field monitoring (OVA, sight, and smell) during all drilling activities. Because these sites reportedly received a mix of materials (metals, volatile organics, etc.) the volatiles make an effective indicator of contamination. As such, the OVA monitoring will detect any unexpected contamination during drilling activities. If field monitoring indicates contamination, the cuttings at that site will be drummed, tested, and disposed of accordingly.

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ON-SITE DEVELOPMENT WATER DISPOSAL: Using data from the 1986 Verification Study, only wells located at Sites 3 and 7 require special development water disposal considerations. Table 3-1 of the RI/FS Work Plan, Vol. I, June 1990 summarized these data. In addition, historical information for the period each site was active is located in Table 2-14 of the RI/FS Work Plan, Vol. I, June 1990. Based on the age and/or duration of disposal, equilibrium conditions would have already been established at all sites, and therefore well data would not be expected to be markedly different now than in 1986. Based on maximum concentrations detected vs. regulatory limits for TCLP (except at Sites 3 and 7), there is no likelihood that the development water would be toxic according to RCRA criteria. Thus, the most effective approach is to dispose of the waters on-site unless field monitoring indicates drumming and testing is appropriate. Finally, because we believe there is a need to drum the development waters at sites 3 and 7, we will postpone the slug tests at these two sites until the well sampling is performed during Phase II. This will minimize the quantity of potential hazardous waste created at sites 3 and 7.

The Navy believes this work plan deviation to be the most effective and appropriate approach for Phase I activities. We appreciate your continued input into this project. If you have any questions, comments, or concerns, please call Mr. Ted Campbell at (803) 743-0576.

Sincerely,

G. C. BRADLEY, P.E.  
HEAD, REMEDIAL ACTIVITIES BRANCH

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